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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Nichia Corporation

Plaintiff,

VS.

Seoul Semiconductor, Ltd., Seoul Semiconductor, Inc., Creative Technology, Ltd., Creative Labs, Inc., and Creative Holdings, Inc.

Defendants.

Case No: 3:06-CV-0162-MMC (JCS)

STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR DISCOVERY

Judge: Maxine M. Chesney

Pursuant to Magistrate Judge Spero's recommendations and Civil L.R. 6-1(b), 6-2(a), and 7-12, Plaintiff Nichia Corporation ("Nichia") and Defendants Seoul Semiconductor Co., Ltd. and Seoul Semiconductor, Inc. ("Seoul"), through their respective undersigned counsel, hereby stipulate and respectfully request an order extending the deadlines for discovery as follows:

- 1. Deadline to Propound Discovery Requests on Parties: March 2, 2007.
- 2. Deadline to Propound Discovery Requests on Non-Parties: March 13, 2007.
- 3. Non-Expert Discovery Cutoff: April 13, 2007.
- 4. Deadline for Expert Disclosures: April 27, 2007.
- 5. Deadline for Rebuttal Expert Disclosures: <u>May 18, 2007</u>.
- 6. Expert Discovery Cutoff: <u>June 1, 2007</u>.

I. REASONS SUPPORTING THE REQUEST

The parties stipulate and agree that good cause exists to extend the discovery deadlines because the parties cannot reasonably complete discovery, including third-party discovery, despite their diligence. In addition, the parties stipulate and agree that good cause exists because the proposed stipulated request will not prejudice or harm the parties or the Court because it will not effect any other pretrial deadlines or the date for trial.

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1	II. PRIOR MODIFICATIONS AND REQUESTS			
2	The May 2, 2006 Pretrial Preparation Orde	The May 2, 2006 Pretrial Preparation Order has not yet been modified by the Court.		
3	3 Nichia and Seoul have each filed notices withdray	Nichia and Seoul have each filed notices withdrawing their respective motions requesting		
4	4 extension of discovery deadlines, filed on January	extension of discovery deadlines, filed on January 3, 2007.		
5	III. CONCLUSION			
6	The parties stipulate and respectfully reque	The parties stipulate and respectfully request an Order extending discovery deadlines.		
7	7 Respectfully	Respectfully submitted,		
8	8	, and the second se		
9		IAM MCCUTCHEN LLP		
10	•			
11				
12	Bv:	/s/		
	Att	BETH H. PARKER orneys for Defendants Seoul Semiconductor, Ltd. and Seoul Semiconductor, Inc.		
14	[[DATED, January 19, 2007			
15	FOLEY	Z & LARDNER LLP		
16	16			
17	17 By:	/s/		
18	Бу	MICHAEL J. SONG		
	19 Att	orneys for Plaintiff Nichia Corporation		
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	PURSUANT TO STIPULATION, IT IS	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
21				
	22 DATED: January 22, 2007			
23	23	Mafine M. Cheker HOLORABLE MAXINE M. CHISNEY		
		HOLORABLE MAXINE M. CUISNEY		
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	3 CERRY ATER REQUEST AND ERRORGERS ORDER TO 2.00 CV 01(2 MMC (ICS))			
	STIPULATED REQUEST AND [PROPOSED] ORDER EXTEND DEADLINES FOR DISCOVERY	3:06-CV-0162-MMC (JCS)		